

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
FRANCHISE GROUP, INC., <sup>1</sup>	)	
	)	Case No. 24-12480 (LSS)
Reorganized Debtor.	)	
	)	
	)	
	)	

**NOTICE OF AMENDED<sup>2</sup> AGENDA FOR  
HEARING OF MATTERS SCHEDULED FOR  
SEPTEMBER 30, 2025 AT 3:30 P.M. (PREVAILING EASTERN TIME)**

**WITH PERMISSION FROM THE COURT, ALL PARTIES OTHER  
THAN DELAWARE LOCAL COUNSEL MAY PARTICIPATE  
IN THE HEARING VIA ZOOM.**

Case participants who are permitted to attend remotely must register using the <http://www.deb.uscourts.gov/ecourt-appearances> tool described below.

The deadline to register for remote attendance is 4:00 P.M. (prevailing Eastern Time) the business day before the hearing unless otherwise noticed. When registering, case participants may choose to attend remotely through video or audio access. Please be aware that if you choose audio access and the proceedings involve witness testimony, you may be disconnected entirely from the hearing or moved to a waiting room and unable to hear that portion of the proceedings. Once you register your appearance, a screen will appear that states “Thank you for registering your appearance in (Case number) (Case name).” An electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

**Please do not contact the United States Bankruptcy Court  
for the District of Delaware to confirm registration.**

<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term “Reorganized Debtors” includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

<sup>2</sup> **Amended items appear in bold.**

**RESOLVED MATTERS**

1. Application of AP Services, LLC for Approval of Completion Fee [[D.I. 1687](#), 7/2/25]

Objection Deadline: July 23, 2025, at 4:00 p.m. (prevailing Eastern Time)

Related Documents:

A. Certificate of No Objection Regarding Docket No. 1687 [[D.I. 1758](#), 7/24/25]

B. Order Approving the Application of AP Services, LLC for Approval of Completion Fee [[D.I. 1766](#), 7/28/25]

Responses Received: None.

Status: An order has been entered. A hearing is not required.

2. 6001 Powerline Road, LLC's Motion for Allowance and Payment of Chapter 11 Administrative Expense Claim [[D.I. 1700](#), 7/7/25]

Objection Deadline: July 21, 2025, at 4:00 p.m. (prevailing Eastern Time); extended for the Reorganized Debtors to September 25, 2025, at 4:00 p.m. (prevailing Eastern Time)

Related Documents: None to date.

Responses Received:

A. Informal response from the Reorganized Debtors.

Status: This matter has been consensually resolved. The parties have agreed that a hearing is unnecessary.

3. Karen Olson's Motion for Relief from Stay [[D.I. 1801](#), 8/6/25]

Objection Deadline: September 9, 2025, at 4:00 p.m. (prevailing Eastern Time)

Related Documents:

A. Re-Notice of Motion for Relief from Stay [[D.I. 1811](#), 8/8/25]

B. Certification of Counsel Regarding Stipulation Granting Karen Olson Limited Relief from the Plan Injunction [[D.I. 1842](#), 8/26/25]

C. Order Approving Stipulation Granting Limited Relief from the Plan Injunction [[D.I. 1850](#), 9/5/25]

Responses Received:

A. Informal response from the Reorganized Debtors

Status: An order has been entered. A hearing is not required.

**MATTERS UNDER CERTIFICATION**

4. Litigation Trustee's Motion to Modify Protective Order [[D.I. 1851](#), 9/5/25]

Objection Deadline: September 19, 2025, at 4:00 p.m. (prevailing Eastern Time)

A. Certification of No Objection Regarding Litigation Trustee's Motion to Modify Protective Order [[D.I. 1868](#), 9/22/25]

Related Documents: None.

Status: A certificate of no objection has been filed. **This matter is going forward to address the Court's questions.**

5. Reorganized Debtors' First (1<sup>st</sup>) Omnibus (Non-Substantive) Objection to Claims [[D.I. 1845](#), 8/29/25]

Objection Deadline: September 19, 2025, at 4:00 p.m. (prevailing Eastern Time); extended for CRG Financial LLC to September 22, 2025, at 4:00 p.m. (prevailing Eastern Time)

Related Documents:

A. Certification of Counsel Regarding Proposed Order Sustaining Reorganized Debtors' First (1st) Omnibus (Non-Substantive) Objection to Claims [[D.I. 1869](#), 9/23/25]

Responses Received:

B. Informal responses from the following:

- i. Gregory Realty, GP
- ii. Buddy Mac Holding, LLC
- iii. CRG Financial LLC

**Additional Related Documents:**

C. Order Sustaining Reorganized Debtors' First (1<sup>st</sup>) Omnibus (Non-Substantive) Objection to Claims [D.I. 1873, 9/29/25]

**Status:** This matter has been adjourned, solely with respect to the informal response of CRG Financial LLC. **An order has been entered. A hearing is not required.**

**FINAL FEE APPLICATIONS**

6. Final Fee Applications – See **Exhibit A** (attached)

**Objection Deadline:** Not later than August 11, 2025, at 4:00 p.m. (prevailing Eastern Time); extended for Granite Telecommunications to August 14, 2025, at 11:59 p.m. (prevailing Eastern Time)

**Related Documents:**

- A. Certification of Counsel Regarding Omnibus Order Approving Final Fee Applications of Committee's Professionals [D.I. 1846, 9/2/25]
- B. Certification of Counsel Regarding Proposed Omnibus Order Approving Final Fee Applications of the Debtors' Professionals for the Final Fee Period from November 3, 2024 Through June 2, 2025 for All Debtors and from June 3, 2025 Through July 1, 2025 for the TopCo Debtor [D.I. 1847, 9/3/25]
- C. Certification of Counsel Regarding Proposed Omnibus Order Approving Final Fee Applications of the Debtors' Professionals Retained on Behalf of and at the Sole Direction of the Independent Director, Michael J. Wartell [D.I. 1857, 9/16/25]

**Responses Received:**

- D. Informal Response from Granite Telecommunications
- E. Informal Response from the Office of the United States Trustee for the District of Delaware

**Status:** Certifications of counsel have been filed. **The Court has advised the Reorganized Debtor's undersigned counsel that it is in the process of reviewing final fee applications and that this matter will not go forward at the hearing.**

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Dated: September 29, 2025  
Wilmington, Delaware

*/s/ Shella Borovinskaya*

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